## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:	)	
ANDY LAMAR ALLMAN	) Case No. 17-03085	
,	) Chapter 13 proceedi	ngs
Debtor .	) Judge Walker	
	)	
ANDY LAMAR ALLMAN.,  Debtor .	, <u> </u>	

## EXPEDITED MOTION TO CONTINUE OMNIBUS MOTIONS, RESPONSES, AND DEPOSITIONS SCHEDULED FOR JULY 26, 2017

Comes the Creditor and Party in Interest, Inge Goodson (Goodson), through counsel, and moves this Court to reschedule the omnibus motions, responses and depositions in this case (Docket Entry 22) scheduled for July 26, 2017 at 10:00 a.m. until a time on the afternoon of July 26, 2017. In support of said motion, the following would be shown unto the Court:

- 1. This Court conducted a hearing on July 5, 2017 on various motions pending in this matter. Andy Lamar Allman was representing himself pro se and was aware of certain time deadlines established by the Court as well as the time and date that the Court set for the next hearings in this matter.
- 2. On July 13, 2017, the undersigned counsel received a telephone call from David Raybin, criminal counsel for Andy Allman, stating that Mr. Allman was required to be in state court on his criminal matter at the time and date scheduled by this Court the next hearing in this case. Allowing Mr. Allman the benefit of the doubt that this scheduling conflict was simply an oversight, your Movant asks that all matters scheduled for July 26, 2017 at 10:00 a.m. be rescheduled at a later time on the afternoon of July 26, 2017 at a time to be fixed at the Court's convenience in order to accommodate this scheduling snafu.
- 3. While Mr. Allman has not filed statements and schedules in this case, through social media and other forms of communications, between 50 and 100 individuals who may have claims in the aggregate over one million dollars were aware of July 26, 2017 bankruptcy hearing and were making arrangements to be present. This matter needs to be heard on an expedited basis in order to avoid inconvenience to a large number of people who may want to be heard on the case before this Court.

Respectfully submitted,

/s/ Steven L. Lefkovitz, No. 5953 STEVEN L. LEFKOVITZ Attorney for Inge Goodson 618 Church Street, Suite 410 Nashville, TN 37219 (615) 256-8300 fax (615) 255-4516 email: slefkovitz@lefkovitz.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2017, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served via regular U.S. mail, to wit:

Russell Willis
Disciplinary Counsel – Litigation
Board of Professional Responsibility
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Dennis Powers, Receiver Attorney 116 Public Square Gallatin, TN 37066

Andy Lamar Allman, Debtor 639 Bonita Parkway Hendersonville, TN 37075

David Raybin Counsel for Andy Allman 424 Church St Suite 2120 Nashville, TN 37219

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Parties may access this filing through the Court's electronic filing system.